

MEGHAN BLANCO (238171)
LAW OFFICES OF MEGHAN BLANCO
28202 Cabot Road, Suite 300
Laguna Niguel, California 92677
Telephone: (949) 296-9869
Facsimile: (949) 606-8988
E-mail: mblanco@meghanblanco.com

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GABRIEL CHAVEZ,

Defendants.

No. CR 18-CR-173-GW

EX PARTE APPLICATION FOR ORDERS
AUTHORIZING MR. CHAVEZ TO VISIT
HIS AILING GRANDMOTHER IN MEXICO
CITY

Defendant Gabriel Chavez, by and through his counsel of record, Meghan Blanco, respectfully moves this Court for orders permitting him to travel to Mexico City, Mexico in April to visit his ailing grandmother, who is in her 90s and unable to travel. Pretrial Services indicated to Mr. Chavez that they defer to the Court. The United States Attorney's Office indicated to counsel that they oppose the instant request.

Respectfully Submitted,

Dated: March 21, 2023

//s// Meghan Blanco
MEGHAN BLANCO

DECLARATION OF MEGHAN BLANCO

I, MEGHAN BLANCO, declare:

1. I am counsel of record for Gabriel Chavez. Mr. Chavez has been on pretrial release since May 2018. He proceeded to trial in August 2022. The Court declared a mistrial after the jury was unable to reach a verdict, hanging 6-6 on the RICO count and 9-3 in favor of acquittal on the drug counts.

2. Mr. Chavez has exercised his right to a speedy trial. Nevertheless, the government has sought, and received, numerous continuances over Mr. Chavez's objection. Mr. Chavez's retrial is currently slated to begin in August of this year.

3. Mr. Chavez's grandmother is in her 90s. She is in poor health and unable to travel. Mr. Chavez's father and sibling are traveling to Mexico City, Mexico, to visit her in April. The family is concerned that her health is quickly deteriorating, and that she may not be alive much longer.

4. Mr. Chavez would like to travel with his family to Mexico City to visit his grandmother. He is willing to submit to any additional requirements that Court deems necessary to facilitate a final visit with his grandmother.

5. Mr. Chavez emailed his pretrial services officer about the instant request. His officer indicated that pretrial services defers to the court.

6. I emailed the assigned AUSAs about the instant request. They indicated they oppose it.

I declare under penalty of perjury, pursuant to the laws of the State of California, that the foregoing is true and correct.

1 Executed on this 21 day of March, 2023 in San Clemente,
2 California.

3 By: _____/s/ _____

4 MEGHAN BLANCO
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